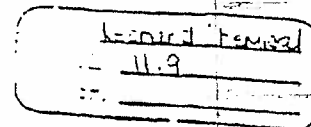




Eveready Battery Company, Inc.
Technology Laboratory



Doc. Number
2004

May 10, 1990

Mr. Wayne Lee
Assistant Regional Counsel
U.S. Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30365

RE: Request for Information Pursuant to Section 104 of CERCLA and Section 3007 of RCRA, for the Leonard Chemical Company, York County, SC

Dear Mr. Lee,

Eveready Battery Company, Inc. a wholly-owned subsidiary of Ralston Purina Company, purchased certain battery related assets from Union Carbide Corporation and assumed certain obligations of Union Carbide Corporation with respect to its past waste disposal practices. Your inquiry, received on 4/19/90 by Union Carbide Corporation, was transmitted by Union Carbide Corporation to Ralston Purina Company and subsequently to Eveready Battery Company, Inc. Eveready Battery has conducted a thorough record search at the Westlake, Ohio Production Headquarters. In addition, interviews were held with key personnel responsible for the management of the material in question (dichlorobenzene) at the former Union Carbide Corporation battery plant in Charlotte, NC.

Attached please find our response to your information request. We have no record or knowledge of ever having dealt with Leonard Chemical Company. Leonard Chemical Company notes indicate that a total of 6 drums of dichlorobenzene were received from "Union Carbide, Charlotte, NC". We do not know if those 6 drums of material came from the battery plant or from another Union Carbide facility in the Charlotte area.

An assessment by the Leonard Chemical PRP group in early 1983 estimated that a total of 6,000 drums had been sent to the site. Assuming that the "Union Carbide" material came from the battery plant, Eveready Battery Company's waste volume share would not exceed 0.1% (6 drums/6,000 drums) and is in fact likely to be much smaller. While we will co-operate with the other PRPs to reach an appropriate resolution at this site, we would like to pursue a de minimus settlement with the U.S. EPA. This issue will be further explored in forthcoming correspondence from Mr. Frank Hackmann of Ralston Purina.

P.O. Box 45035
Westlake, OH 44145-2536

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Mr. Wayne Lee

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May 10, 1990

Please note that this response is on behalf of Ralston Purina Company and Eveready Battery Company. It is not on behalf of Union Carbide Corporation. Should you have any questions after reviewing this letter, please advise at your convenience. Thank you very much.

Sincerely,



ALBERT M. NASH
Mgr. Environmental Affairs
Eveready Battery Co., Inc.
216/835-7607

Attachments

AMN/kb
(31488)

cc: F. H. Hackmann - St. Louis (9T)
S. M. Simeone - St. Louis (1EBC)
G. Klein - Union Carbide Corp.